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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	CASE NO. 17-32670-HDH-13
Ervin Frank Layer	§	
	§	CHAPTER 13
	§	
Debtor(s)	§	

**DEBTOR'S RESPONSE TO TRUSTEE'S NOTICE OF INTENT TO DISMISS
DEBTOR'S CHAPTER 13 CASE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **Ervin Frank Layer**, (hereinafter "Debtor") in the above-styled and numbered cause and in response to the Standing Chapter 13 Trustee's Notice of Intent To Dismiss Chapter 13 Case would respectfully show the Court, as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 7/7/2017.
2. Debtor have suffered a financial setback which has caused him/her/them to fall delinquent on their Chapter 13 Plan payments. Debtor will a modification request to the Chapter 13 Trustee to cure the delinquency.
3. The above referenced delinquency will be resolved prior to the scheduled hearing date for Debtor Response to the Notice of Intent to Certify Chapter 13 Case for Dismissal.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that the Trustee's Notice of Intent to Certify Chapter 13 Case for Dismissal be denied and for such other and further relief in law and equity as the Court deems just and proper.

Dated: January 25, 2019

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Nicholas C. Inman
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 25, 2019, a true and correct copy of the foregoing Response to Trustee's Notice of Intent to Dismiss Chapter 13 Case was served on the following parties in interest by electronic notification or first class mail:

STANDING CHAPTER 13 TRUSTEE

Thomas Powers
105 Decker Court, Ste 1150
Irving, Texas 75062

U.S. TRUSTEE

William T. Neary
1100 Commerce, Room 976
Dallas, TX 75242

DEBTOR

Ervin Frank Layer
9814 Faircrest Drive
Dallas, TX 75238

By: /s/ Nicholas C. Inman
Nicholas C. Inman